

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN, et al.	:	

**DEFENDANT BIJAN RAFIEKIAN’S UNOPPOSED MOTION FOR LEAVE
TO APPEAR WITHOUT LOCAL COUNSEL**

Defendant Bijan Rafiekian, through counsel, respectfully moves for leave of the Court to waive the required presence of his local counsel at the Renewed Motion for a New Trial Pursuant to Federal Rule of Criminal Procedure 33 hearing noticed on Wednesday, December 15, 2021, at 10:00 a.m. *See* Dkt. No. 406.

Local Criminal Rule 57.4(F) requires an attorney admitted to practice in this Court to “personally be present at all hearings, pretrials, and trials,” unless granted leave of Court.

Mr. Rafiekian’s local counsel James E. Tysse and Robert P. Trout will be unavailable for business travel and obligations in another court, respectively. Therefore, Mr. Rafiekian moves for leave of Court to permit Mark J. MacDougall, Stacey H. Mitchell, Adam A. Bereston, Samantha J. Block, and Madeline M. Bardi, all of whom have been admitted *pro hac vice* in this case, to appear and address the Court on behalf of Mr. Rafiekian without Messrs. Tysse and Trout present.

Counsel for the government has no objection to this Motion.

Dated: December 10, 2021

Respectfully submitted,

/s/
Mark J. MacDougall (*Pro Hac Vice*)
Stacey H. Mitchell (*Pro Hac Vice*)
James E. Tysse (VA Bar #73490)
Adam A. Bereston (*Pro Hac Vice*)
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CERTIFICATE OF SERVICE

I hereby certify that, on the 10th day of December 2021, true and genuine copies of Defendant Bijan Rafiekian's Unopposed Motion for Leave to Appear Without Local Counsel was sent via electronic mail by the Court's CM/ECF system to the following:

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/s/
James E. Tysse (VA Bar #73490)